

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

---

ROBERT ALLEN BAUTISTA™,  
Plaintiff,

v.  
GEXA ENERGY, LP and  
NEXTERA ENERGY, INC.,  
Defendants.

No. 3:24-cv-2920-E-BN

---

**FORMAL REQUEST FOR DISCOVERY**

TO: Defendants, GEXA ENERGY, LP and NEXTERA ENERGY, INC.

COMES NOW Plaintiff, ROBERT ALLEN BAUTISTA™, by and through his undersigned counsel, and requests that Defendants, pursuant to Rule 26 of the Federal Rules of Civil Procedure and any applicable local rules, respond to the following requests for discovery.

---

**I. REQUEST FOR PRODUCTION OF DOCUMENTS**

**1. All Documents Relating to the Negotiable Instrument**

Please provide copies of all documents, including but not limited to contracts, agreements, modifications, allonges, and correspondence, pertaining to the negotiable instrument identified in Plaintiff's Petition, including any alterations made to it after issuance.

**2. Communications Related to Plaintiff's Payments**

Please provide all communications (email, written, electronic, or otherwise) between Defendants and Plaintiff regarding payments made by Plaintiff on the alleged negotiable instrument, including any threats, demands, or notices of service termination.

**3. Bills of Exchange and Payment Records**

Please provide records of all bills of exchange, invoices, or statements issued to Plaintiff in relation to the alleged negotiable instrument, including any internal notes or memos discussing or referencing Plaintiff's account and payment history.

**4. Documents Related to Coercion or Termination of Utility Services**

Please provide all documents that evidence or reference any threats made by Defendants regarding termination of Plaintiff's utility services or any internal policies, communications, or records related to Plaintiff's utility service account.

**5. Internal Policies or Procedures on Negotiable Instruments**

Please provide any internal policies, procedures, or manuals concerning the issuance, endorsement, alteration, or acceptance of negotiable instruments, bills of exchange, or payments for services.

---

## II. INTERROGATORIES

1. **Alterations to Negotiable Instrument**

Please describe in detail the alterations made to the negotiable instrument that is the subject of Plaintiff's Petition, including the purpose and authority for the insertion of any allonge or modifications to the instrument.

2. **Knowledge of Fraudulent Alteration**

Did any of the Defendants knowingly participate in or have knowledge of the fraudulent alteration of the negotiable instrument? If yes, please describe in detail the nature of the involvement or knowledge.

3. **Denial of Payment or Services**

Please explain the reason for failing to honor the bills of exchange presented by Plaintiff on September 21, 2024, and October 24, 2024. If any denial occurred, state the reasons for such denial.

4. **Policies Regarding Debt Collection and Coercion**

Please describe Defendants' policies or procedures related to the collection of debt, including any policies governing the use of threats of service termination or other coercive financial practices.

5. **Document Retention and Disposal**

Please identify the retention policies for documents related to Plaintiff's account and any related documents, including whether such documents have been destroyed or altered.

---

## III. REQUEST FOR ADMISSION

1. **Admission of Fraudulent Alteration**

Admit or deny that the negotiable instrument referred to in Plaintiff's Petition was altered through the inclusion of an unauthorized allonge.

2. **Admission of Misrepresentation**

Admit or deny that Defendants made false or misleading representations regarding the negotiability of the altered instrument.

3. **Admission of Coercion**

Admit or deny that Defendants used coercive tactics or threats of utility service termination to compel Plaintiff to make payments on the altered negotiable instrument.

---

## IV. WRITTEN DEPOSITION QUESTIONS

Please answer the following questions in writing under oath:

1. Who authorized the alteration of the negotiable instrument referenced in Plaintiff's Petition?
2. Did any employee or agent of Defendants communicate directly with Plaintiff regarding the terms or conditions of the negotiable instrument after September 1, 2024?

3. Has any Defendant taken action to dispute, acknowledge, or honor Plaintiff's bills of exchange submitted on September 21, 2024, and October 24, 2024? If yes, please explain.

---

Plaintiff requests that these discovery responses be served in accordance with the deadlines provided in the Federal Rules of Civil Procedure.

Respectfully submitted,

WITHOUT RECOURSE  
WITHOUT PREJUDICE

**ROBERT ALLEN BAUTISTA™**  
**BY: /s/ Bautista, Robert-Allen / Agent**

-----  
Robert Allen Bautista / Attorney-In-Fact

PO BOX 131385  
DALLAS, TX 75313-1385  
702-501-9639  
RBRTBTST16@GMAIL.COM

Dated: January 9, 2025